

**EXHIBIT "C"**

DECLARATION OF TINA ARNDT

I Tina Arndt, say and declare as follows:

1. I first Met Joseph Boehm in or around 1996. I went to his house for the first time soon thereafter;
2. I again met Mr. Boehm in or around 1998. Mr. Boehm never went into work and seldom if ever left the house due to being incapacitated as a result of severe "crack" cocain psychosis;
3. Mr. Boehm was constantly paranoid and would never throw newspapers or trash out as a result of his paranoia. Mr. Boehm would have me sift through all his trash multiple times to make sure there was nothing of value that anyone could use against him;
4. I began staying at Mr. Boehm's home on a regular basis and became familiar with all of his acquaintances, friends and family;
5. I was also a long time and experienced "crack" cocain user and was familiar enough with the substance to be able to identify the difference between clean and dirty "crack" cocain;
6. The difference described above is that the dirty "crack" cocain appeared to have negative affects and affected the user in a significantly different way, specifically, it would have aspects of opiate drug affects that would cause sickness, sleepiness, incoherence and an inability to coherently assess your surroundings;
7. Leslie Williams was a cocain dealer who sold crack cocain to Mr. Boehm on a daily basis. He also provided cocain to others including Bambi Tyree who would in turn provide some to others;

- 1 8. Although I primarily used the "crack" cocaine sold to Mr.  
2 Boehm, I purposely found occasion to use some that had been  
3 provided to Bambi Tyree and can unequivocally state that the  
4 "crack" cocaine provided to Bambi Tyree was devoid of the side  
5 affects of the "dirty" crack cocaine (as described above)  
6 provided to Mr. Boehm;
- 7 9. Among the various affects on Mr. Boehm was an obsessive desire  
8 for total privacy and security. This desire manifested itself  
9 in ways such as staying primarily in the upstairs of his home,  
10 installing a deadbolt lock on his bedroom door in the hope of  
11 preventing anyone from coming into his bedroom, installing a  
12 sophisticated alarm system which was kept activated 24 hours a  
13 day for the purpose of keeping people out of his home and  
14 certainly not for the purpose of keeping them trapped inside;
- 15 10. The desire of unwanted visitors to gain entry into the Boehm  
16 home was manifested, amongst other things, by these people  
17 breaking out a window in the back downstairs bedroom to give  
18 them a consistent means of entering and leaving the Boehm home  
19 at will;
- 20 11. Throughout the time period that I lived with Mr. Boehm he  
21 became acquainted with Bambi Tyree. What evolved was Bambi  
22 Tyree leading Mr. Boehm into the belief that she had great  
23 affection for him, wanted to be with him, was willing to party  
24 with him, including arranging for "crack" cocaine.
- 25 12. Bambi Tyree over a short period of time literally overcame the  
26 free will of Mr. Boehm and began to control his life. She  
27 began to make all of the decisions affecting the day to day  
28 activities of Mr. Boehm. This would include ensuring he

1 remained high from the moment he awoke until the time he  
2 passed out, determining who she would allow to be in the house  
3 and how she would use other young girls to further try to  
4 control Mr. Boehm;

5 13. During the same time period, Bambi Tyree was abusing Mr. Boehm  
6 both physically and psychologically. She would intimidate him  
7 with threats of calling law enforcement and by bringing other  
8 men to physically intimidate Mr. Boehm, by stealing his  
9 personal property, cash, cars and then charging him to return  
10 the property;

11 14. One of the girls Bambi Tyree befriended was sally Purser and  
12 her mother Kathleen Purser. She had done "crack"cocain with  
13 Sally Purser and was aware that Sally Purser's mother Kathleen  
14 was "pimping" her out to drug dealers in exchange for "crack"  
15 cocain;

16 15. Whenever Sally Purser was at Mr. Boehm's house she was almost  
17 always with me. Mr. Boehm trusted me and I had his permission  
18 to be in any area of his home. This gave me the opportunity to  
19 become familiar with the daily activities and events that were  
20 regularly taking place. I observed Sally Purser to be present  
21 at Mr. Boehm's house on some occasions and can personally  
22 attest to the fact that at no time did he ever engage in any  
23 sexual activity or conduct with her;

24 16. Although I would have been a willing sexual partner for Mr.  
25 Boehm, he never made a pass at me or attempted to engage in  
26 sexual activity with me. It was clear that Mr. Boehm's severe  
27 "crack" addiction, the side affects of the "dirty" "crack"  
28 cocain regularly provided to him and being provided "crack"

1       cocain by Bambi Tyree from the time he awoke until the time he  
2       passed out as well as his deteriorating mental and physical  
3       condition did render him unable to engage in sexual activity  
4       even when he wanted to;

5   17. During the time I am describing Mr. Boehm seldom left his  
6       bedroom, often never went downstairs and hardly ever knew who  
7       was in his house. With his degree of paranoia it was almost  
8       impossible for him to deal with a number of people present  
9       that he could not keep track of;

10  18. Mr. Boehm often became afraid to stay in his own home for the  
11       above reasons. He started moving from hotel to hotel because  
12       the size of the room and the physical circumstances enabled  
13       him to know who was present and to feel at least a minimally  
14       reduced paranoia over the small surroundings to which he felt  
15       he had more control;

16  19. Mr. Boehm would continue to smoke "crack" cocain in these  
17       rooms and was able to have a better handle on who was and was  
18       not present and when they came and left. Prior to starting to  
19       stay at hotels, Mr. Boehm, in an attempt to clear his house of  
20       everyone in it, including but not limited to Bambi Tyree and  
21       Sally Purser, actually stuffed and clogged the plumbing so as  
22       to flood the entire downstairs portion of his house. He also  
23       disconnected the heaters and notwithstanding all these  
24       efforts, Bambi Tyree would still not leave;

25  20. Also present on a regular basis, in addition to Leslie  
26       Williams, was Al Bolling. Mr. Bolling was also a supplier of  
27       "crack" cocain, however, he also was physically and sexually  
28       abusive with some girls.

1 21. Based upon my almost ten year relationship with Mr. Boehm, my  
2 intimate knowledge of his life and lifestyle, including but  
3 not limited to the events described above, led me to the  
4 undeniable conclusion that Al Bolling and Leslie Williams were  
5 drug sellers who sold drugs to Mr. Boehm and others and were  
6 not involved in any other aspects of Mr. Boehm's life. I also  
7 observed Bambi Tyree with the assistance of Sally Purser and  
8 others with whom she was involved engaged in a plot to keep  
9 Mr. Boehm high on "crack" cocaine to enable them to steal his  
10 property, cash, cars and too seek to gain control over his  
11 financial resources.

12 22. I have given this declaration of my own free will without any  
13 promise of reward or threat of coercion. I declare under  
14 penalty of perjury under the laws of the State of Alaska that  
15 this declaration is the truth and I will testify consistent  
16 with if called to do so in a court of law. I have had the  
17 opportunity to read and revise this declaration prior to  
18 signing it.

19  
20 Executed this 14 day of December, 2006 at Anchorage, Alaska.

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23 Tina Arndt  
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